

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
) CC Docket No. 97-181
Defining Primary Lines)

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COMMENTS

BellSouth Telecommunications, Inc. ("BellSouth") files these comments in response to the *Further Notice of Proposed Rulemaking* issued in the above-referenced proceeding.¹ The FNPRM proposes to implement a "primary" rate to be applied to subscriber line charge ("SLC") and presubscribed interexchange carrier charge ("PICC") charges on the accounts of customers having hearing or speech disabilities. In BellSouth's view, the FNPRM and the issues it presents further highlight the complexity of implementing a two-tier rate structure for residential lines. The distinction between primary and secondary lines has proven confusing to end user customers. Moreover, BellSouth can identify no countervailing benefit which justifies the added administrative and record keeping burdens attendant upon a dual rate structure. For these reasons BellSouth continues to believe that the optimum solution is to eliminate the primary/secondary line distinction and apply a single SLC and PICC rate to all residential lines in common.

Nevertheless, if the Commission intends to maintain a dual rate structure, BellSouth concurs with the FNPRM proposal, which would assess the primary line rate to one residential

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¹ In the Matter of Defining Primary Lines, CC Docket No. 97-181, FCC 99-28, *Report and Order & Further Notice of Proposed Rulemaking*, released March 10, 1999 (hereinafter "FNPRM").

line per location used in conjunction with text telephone (“TTY”) equipment. BellSouth further agrees that the primary rate should apply in this case without regard to whether a second line at the same location and employing no such equipment is likewise receiving the primary rate.

BellSouth believes such instances will, however, be rare. An analysis of company records reveals that the vast majority of BellSouth customers using TTY equipment have only one line at the location, which serves the communications needs of all residents, whether or not disabled.

In those circumstances where a non-primary residential line is dedicated to the use of TTY equipment, BellSouth therefore agrees that such line should be treated as primary for purposes of SLC and PICC assessment. BellSouth also supports the FNPRM proposal to recover the difference between the primary rate and the secondary rate which would otherwise be applicable through reimbursement by the Telecommunications Relay Services (“TRS”) Fund or the Universal Service Fund.

BellSouth customer records indicate whether a customer uses TTY equipment, and procedures exist within BellSouth’s region which enable customers to self-identify as TTY users. Hence, BellSouth perceives no need to adopt formal certification requirements for this program.


CONCLUSION

BellSouth urges the Commission to implement the proposals contained in the FNPRM in a manner consistent with the foregoing comments.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

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Date: April 9, 1999

CERTIFICATE OF SERVICE

I do hereby certify that I have this 9th day of April 1999 served the following parties to this action with a copy of the foregoing COMMENTS by hand delivery or by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed below.

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*** VIA HAND DELIVERY**